

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

VANDERBILT UNIVERSITY,)	
)	Civil Action No. 3:18-cv-00046
<i>Plaintiff,</i>)	
)	Judge Campbell
V.)	Magistrate Judge Frensley
)	
SCHOLASTIC, INC.; HOUGHTON MIFFLIN)	JURY DEMAND
HARCOURT PUBLISHING COMPANY; and)	
TED S. HASSELBRING,)	
)	
<i>Defendants.</i>)	

**JOINT MOTION FOR ADDITIONAL EXTENSION OF DEADLINE TO BRING FACT
DISCOVERY MOTIONS**

Plaintiff Vanderbilt University (“Vanderbilt”) and Defendants Houghton Mifflin Harcourt Publishing Company (“HMH”), Scholastic, Inc. (“Scholastic”), and Ted S. Hasselbring (“Hasselbring”) jointly move the Court to enter an Order allowing either (1) Vanderbilt or HMH or (2) Vanderbilt or Hasselbring until March 6, 2020 to bring a discovery motion against the other in this matter concerning any prior discovery disputes, and until March 16, 2020 for the parties to bring a discovery motion against another in this matter concerning disputes, if any, arising out of forthcoming responses to discovery requests as outlined below.

1. On February 10, 2020, Vanderbilt filed three motions (two of them joint motions with the respective defendant) for an extension of the deadline for parties to bring fact discovery motions to allow time to resolve several outstanding discovery issues without involving the Court. Docket Nos. 196–198.
2. On February 11, 2020, the Court granted the two joint motions for extension of time. Docket Nos. 202–203.

3. On February 13, 2020, Vanderbilt and HMH filed a second joint motion for an extension of the deadline until February 18, 2020 for either to bring fact discovery motions against the other in order to give themselves additional time to resolve several outstanding discovery issues without involving the Court. Docket No. 204. The Court granted that motion on February 14, 2020. Docket No. 205.
4. On February 18, 2020, Vanderbilt and HMH filed a third joint motion for an extension of the deadline until February 28, 2020 for either to bring fact discovery motions against the other in order to give themselves additional time to resolve remaining outstanding discovery issues without involving the Court. Docket No. 207. The Court granted Vanderbilt and HMH's third joint motion on February 19. Docket No. 209.
5. Also on February 18, 2020, Vanderbilt and Scholastic also filed a joint motion to extend the deadline until March 5, 2020 for Vanderbilt and Scholastic to bring fact discovery motions against the other (and agreed the Court could dismiss a prior motion to compel as moot). Docket No. 206. The Court granted both requests on February 19, 2020. Docket Nos. 208–209.
6. On February 20, 2020, Vanderbilt and Defendant Hasselbring filed joint motion for an extension of the deadline until February 28, 2020 for either to bring fact discovery motions against the other in order to give themselves additional time to resolve remaining outstanding discovery issues without involving the Court. Docket No. 211. The Court granted Vanderbilt and Hasselbring's joint motion on February 21. Docket No. 212.
7. Vanderbilt and HMH, and Vanderbilt and Hasselbring, have continued to make progress on a consensual resolution of, but have not fully resolved, all prior

outstanding fact discovery issues.

8. In order to give Vanderbilt, HMH, and Hasselbring some additional time to try to fully resolve these prior discovery disputes without involving the Court, Vanderbilt, HMH, and Hasselbring respectfully request an extension until March 6, 2020 for either to bring a fact discovery motion against the other concerning these prior discovery disputes.
9. Additionally, the parties have agreed to extend certain deadlines related to responses to fact discovery requests until March 6, 2020. The responses that have been agreed to be extended are:
 - a. Vanderbilt's response to Defendants Scholastic Inc. and HMH's First Set of Requests for Admission to Vanderbilt,
 - b. Vanderbilt's response to Defendant HMH's Second Set of Interrogatories to Vanderbilt,
 - c. Each defendant's response to Vanderbilt's First Set of Requests for Admission (for the set served on the respective defendant),
 - d. Defendant Hasselbring's response to Vanderbilt's Fourth Request for Production of Documents to Hasselbring,
 - e. Vanderbilt's response to Defendant Scholastic's Second Set of Interrogatories to Vanderbilt, and
 - f. Vanderbilt's response to Defendant Hasselbring's Third Set of Interrogatories.
10. In order to address issues, if any, as may relate to the forthcoming responses to the discovery requests above, the parties respectfully request an extension until March 16, 2020 for any to bring a fact discovery motion against the other concerning either

party's forthcoming responses identified in Paragraph 9. Additionally, the parties request an extension until March 16, 2020 for Vanderbilt to bring a fact discovery motion against HMH or Scholastic as to issues, if any, as may relate to those defendants' responses and objections to Vanderbilt's January 29, 2020 Request for Production of Documents to HMH and Scholastic, which responses were served on February 28, 2020.

For the foregoing reasons, the parties respectfully request that the Court grant this joint motion to allow both Vanderbilt and HMH, and Vanderbilt and Hasselbring, until March 6, 2020 to bring a fact discovery motion in this matter against the other concerning prior discovery disputes, and to extend the time until March 16, 2020 to bring a fact discovery motion in this matter against another concerning the responses to the certain discovery responses outlined above.

Dated: February 28, 2020

RESPECTFULLY SUBMITTED BY:

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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon these individuals, via the Court's CM/ECF e-mail notification system, on this the 28th day of February 2020:

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